

## **RESPONSE TO COMMENTS**

**Response to Alabama Department of Environmental Management Comments  
Draft Site Investigation Report  
Former Range 41, Parcel 95Q and Impact Area, Choccolocco Corridor, Parcel 131Q-X  
Dated April 17, 2003  
Fort McClellan, Calhoun County, Alabama**

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*Comments from Stephen A. Cobb, Chief, Governmental Hazardous Waste Branch, Land Division, dated November 21, 2003.*

***General Comments***

**Comment 1:**      The Alabama Department of Environmental Management (ADEM or the Department) has reviewed Fort McClellan's *Draft Site Investigation Report* regarding Parcels 95Q and 131Q-X in the Choccolocco Corridor. ADEM concurs with the overall content and intent of the submittal. However, ADEM and EPA have some comments that warrant future attention. These comments are attached for your review.

After conducting the site investigation for these two parcels, Fort McClellan concluded that a remedial investigation (RI) was warranted. ADEM and EPA agree that further investigation is appropriate and warranted at this time. Fort McClellan has already submitted an RI workplan to ADEM addressing several parcels located in the Choccolocco Corridor, including Parcels 95Q and 131Q-X. The RI workplan is currently under review by the Department.

According to the text, Parcel 95Q was most likely used as a training area and was listed as a "Battle Drill and Assault Range". Parcel 131Q-X was reportedly a former impact area. The report states that the most significant contaminant of potential concern is lead. As with several other ranges at Fort McClellan, the presence of lead bullets and bullet fragments must be resolved with regard to human health and ecological risk.

The Department understands that Fort McClellan conducted an Ordnance and Explosive (OE) Engineering Evaluation/Cost Analysis for the Charlie Area, which includes the Choccolocco Corridor. At this time, UXO matters remain unresolved in this area and will be addressed during ADEM's review of the related workplans and reports for this area.

**Response 1:**      Comments noted.

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***Specific Comments***

**Comment 1:** Throughout the document, figures illustrating analytical results indicate up to eight significant digits for the SSSL values making it difficult to read and compare. The number of significant figures should be consistent.

**Response 1:** Agree. The figures were revised per comment.

**Comment 2:** Page 1-3, Lines 20-21: These lines state that bullet fragments were found on the ground surface in some areas of the site. The presence of bullet fragments must be addressed in a more comprehensive manner in the proposed RI. Fort McClellan should be aware that lead on ranges on site are considered to be the release of a hazardous substance pursuant to CERCLA § 104(a), and therefore needs to be reported and handled accordingly. The areas containing lead fragments should be mapped. All of these visible contamination areas, as well as other significant lead fragment/contamination areas should be removed, even from areas that do not exhibit elevated soil concentrations.

**Response 2:** Comment noted.

**Comment 3:** Appendix A. the reason for using chain of custody (COC) forms is the ability to reconstruct the custody of the samples from the time of sample collection until time of receipt by the analytical laboratory. Signatures must be present at the appropriate location on the appropriate forms. The sampling records in this appendix will not allow for the reconstruction of the COC for the following reasons:

- In all cases, the name of the person relinquishing custody on the COC form does not appear on the sample collection log as one of the samplers
- On seven of the nine COC forms, the "Received By" block contains printed names, not signatures.

**Response 3:** Disagree. Shaw followed the procedures outlined in Section 6.1.7.1 *Field Custody Procedures* presented in the *Draft Installation-Wide Sampling and Analysis Plan*, Revision 3, February 2002 (SAP). This sections states, "The sampling team, sample coordinator, and site manager will maintain overall responsibility for the care and custody of the samples until they are transferred

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or properly dispatched to the on-site screening facility and/or fixed-based laboratory." In addition, SAP Section 6.1.7.2 *Transfer of Custody and Shipment* states, "General custody of the sample will be maintained by the sample collection team members from the time of collection in the field through preparation and shipment to the laboratory. The main custody transfer will occur when the sample shipment is received into the laboratory from the field and is documented." Similar language is also provided in the QAP.

Using these two sections as guidance, all Shaw field personnel who are responsible for the collection of field samples (which includes the sample coordinator and the site manager) were considered part of the "sample team." No custody transfer record was considered to be necessary among members of the same sample collection team. If another contractor, a subcontractor to Shaw, the Army, or other personnel had collected samples and transferred them to Shaw for processing or analysis, then the transfer of custody of those samples would have been formally recorded using a COC form.

Multiple sample technicians were responsible for collecting samples and completing the sample collection logs. The samples and logs were funneled to the Shaw sample coordinator, who then reviewed the documentation, inventoried all of the samples collected, and compiled a single COC record to list all the samples collected (daily) for transfer to the receiving analytical laboratories. Therefore, the sample coordinator's signature on the form represents the transfer of custody from the Shaw sample team in the field to the analytical laboratory personnel (per Section 6.1.7.2 of the SAP). Shaw believes that this is satisfactory custody transfer documentation and, therefore, does not agree this indicates that sample custody was not maintained as stated in the comment. Shaw personnel followed the same chain-of-custody procedures that have been in effect since the beginning of the FTMC project in 1998. It is perplexing that until now these issues have never been called into question.

However, in light of recent comments received by ADEM and EPA, Shaw has changed its COC procedures to include a separate COC for each sample collection team. Each sample collection team will submit samples, COCs, and SCLs to the sample coordinator. The SCLs and COCs will be reviewed by the sample coordinator prior to taking possession of the samples and signing the COC. This process will be repeated for each sample collection team in the field. The COCs will then be copied for the field records and maintained onsite. The original forms will be transmitted to the office for filing in the project central files. In future reports, this appendix will include all

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"supplementary" sample team COCs to document intra-team custody transfers and all SCLs.

Regarding the second bullet: Is ADEM implying that someone's "signature" can only be made through cursive writing? If an individual signs a document and is willing to affirm that the signature is indeed their own unique mark, then the manner in which that signature is made and the form that signature takes are irrelevant.

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*Comments from Doyle T. Brittain, Senior Remedial Project Manager, dated May 28, 2003.*

***General Comments***

**Comment 1:** A review of the ecological risk sections of this document were performed and the recommendation that a remedial investigation be conducted at this site is appropriate. As with other ranges at Ft. McClellan, the issue of bullet fragments present in various areas of the site must be resolved with regard to ecological risk.

**Response 1:** Comment noted.

**Comment 2:** Figures showing analytical results show up to 8 significant digits for the SSSL values. This is not really appropriate and makes the values difficult to read and compare. The number of significant figures should be consistent and defensible.

**Response 2:** Agree. The figures were revised accordingly.

***Specific Comments***

**Comment 1:** Page 1-3, Line 17. An "L"-shaped berm is mentioned here. This berm is shown on Figure 1-2 but it is not identified on the figure. The identification of this feature should be added to the figure.

**Response 1:** Disagree. The symbol for "berm" is shown in the legend of Figure 1-2.

**Comment 2:** Page 1-3, Line 20 and 21. These lines state that bullet fragments were found on the ground surface in some areas of the site. The presences of the bullet fragments must be addressed in a more comprehensive manner in the proposed Remedial Investigation Study. Please note that EPA considers lead on ranges at Fort McClellan to be the release of a hazardous substance pursuant to CERCLA § 104(a), and therefore needs to be reported and handled accordingly. The areas containing lead fragments should be mapped. All of these visible lead fragments should be removed, even from areas that do not exhibit elevated soil concentrations.

**Response 2:** Comment noted.

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**Comment 3:** Appendix A. Comparisons of the Sample Collection Logs with the Chain of Custody Records indicated some inconsistencies. In all cases, the name of the person relinquishing custody on the Chain of Custody form does not appear on the sample collection log as one of the samplers. In addition, in the Received-By block of the Chain of Custody Records, a printed name is included instead of a signature on seven of the nine forms. Unless these inconsistencies can be satisfactorily explained, chain of custody was not maintained on these samples.

**Response 3:** Disagree. Shaw followed the procedures outlined in Section 6.1.7.1 *Field Custody Procedures* presented in the *Draft Installation-Wide Sampling and Analysis Plan*, Revision 3, February 2002 (SAP). This sections states, "The sampling team, sample coordinator, and site manager will maintain overall responsibility for the care and custody of the samples until they are transferred or properly dispatched to the on-site screening facility and/or fixed-based laboratory." In addition, SAP Section 6.1.7.2 *Transfer of Custody and Shipment* states, "General custody of the sample will be maintained by the sample collection team members from the time of collection in the field through preparation and shipment to the laboratory. The main custody transfer will occur when the sample shipment is received into the laboratory from the field and is documented." Similar language is also provided in the QAP.

Using these two sections as guidance, all Shaw field personnel who are responsible for the collection of field samples (which includes the sample coordinator and the site manager) were considered part of the "sample team." No custody transfer record was considered to be necessary among members of the same sample collection team. If another contractor, a subcontractor to Shaw, the Army, or other personnel had collected samples and transferred them to Shaw for processing or analysis, then the transfer of custody of those samples would have been formally recorded using a COC form.

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Regarding the second part of the comment: Is EPA implying that someone's "signature" can only be made through cursive writing? If an individual signs a document and is willing to affirm that the signature is indeed their own unique mark, then the manner in which that signature is made and the form that signature takes are irrelevant.